

August 15, 2019

Marie Huber
Project Manager
USACE Jacksonville District
Ecosystem Branch

Re: GENERAL COMMENTS ON DRAFT BBCW PHASE 2 PROJECT MANAGEMENT PLAN

Dear Marie:

I am a member of the Biscayne Bay Regional Restoration Coordinating Team (BBRRCT) representing the Greater Miami Chamber of Commerce. I am also a former Governing Board Member of the South Florida Water Management District (SFWMD) who voted to enter into a Memorandum of Agreement in 2004 with the Federal Government to accelerate environmental restoration through early design and construction of eight Everglades restoration projects identified by the U.S. Congress as priorities one of which was the Biscayne Bay Coastal Wetlands (BBCW) project.

Since then, I have continued advocating and urging for the completion of Phase 1 and the commencement of Phase 2 planning efforts. The current progress of the Phase 2 of the Biscayne Bay Coastal Wetlands (BBCW) Draft Project Management Plan (PMP) is encouraging.

Thank you for the opportunity to comment on the draft PMP. This important project is the only Comprehensive Everglades Restoration Project (CERP) to directly benefit the health of Biscayne Bay and Biscayne National Park (BNP).

Background

The BBCW Project was divided into two phases due to the complexity associated with fulfilling the primary objective of Phase 2, identifying additional clean freshwater to restore the appropriate salinity year-round in Biscayne Bay and BNP. Phase 2 identifies and analyzes options or combinations of options to provide this additional freshwater to Biscayne Bay and BNP.

Resolutions were passed in 2016 and 2017 by Miami-Dade County and its coastal municipalities, including the Village of Palmetto Bay, Village of Pinecrest, Town of Cutler Bay, City of South Miami, City of Miami, City of Coral Gables, Surfside, Village of Key Biscayne, and the City of Miami Beach urging the U.S. Army Corps of Engineers (USACE), the Florida Department of Environmental Protection (FDEP), and the SFWMD to take all steps necessary to expedite the planning of Phase 2 of the BBCW Project so that such planning occurs as soon as possible and prior to the then scheduled start date of 2021. In addition, an appropriation of \$1.5M was allocated by the State of Florida for the cost share of the planning process in 2017.

In January 2019, Federico E. Fernandez, Esq., Chairman of the SFWMD Governing Board, sent a request letter in to the Honorable R.D. James, Assistant Secretary of the Army Civil Works, requesting funds be reallocated to develop a PMP and Scope of Study for the Phase 2 of the BBCW

Project. The letter states that the additional freshwater to be provided in Phase 2 is crucial to the health of Biscayne Bay and the federal resource, BNP.

In July 2019, Drew Bartlett, Executive Director, SFWMD, sent a request letter to Colonel Andrew Kelly, District Commander-Jacksonville District, USACE, requesting that the USACE allocate funds to begin BBCW Phase 2 planning. The letter further states that the SFWMD proposes to begin planning for the C-111 Spreader Canal Eastern (C-111 SCE) in concert with or as a part of BBCW Phase 2. It is unclear at this time how this joint planning will proceed, and I can only agree with this joint planning if there are no delays to the development of the Phase 2 PIR as a result. Of particular concern are cost sharing-difficulties and existing USACE policies and procedures that may not accommodate such an action. **Perhaps the most efficient way to approach this issue is to add the spreader canal to the Phase 2 study and deauthorize C-111 East after the PIR for BBCW Phase 2 is approved.**

The Draft PMP

Given that identifying additional freshwater is crucial for both the BBCW Phase 2 and for the effective functioning of C-111 SCE, the PMP must clearly include as its primary objective identifying and analyzing options or combinations of options to provide additional clean freshwater to Biscayne Bay from both within and outside the basin. Potential options identified are bringing seepage and runoff water from the Regional System, use of Aquifer Storage Recovery, use of Reservoirs, and use of treated wastewater. This additional freshwater must be provided for ecosystem restoration of Biscayne Bay and to BNP.

The C-103 Canal provides water directly into BNP. The PMP should consider the potential need to expand the conveyance capacity of one or more of the regional canals (C-1, C-100, C-102, and C-103) in order to convey more water coastward from the L-31N canal so that any additional water from the regional system could potentially be utilized by the BBCW Phase 2 Project without exacerbating flooding concerns. Some of the locations where canal improvements may be needed are located outside the current BBCW Study Area. Therefore, the BBCW Phase 2 Study Area should be expanded. There continues to be a need to focus primarily on the BBCW wetland area between the C-1 and the C-103 Canals.

I am in agreement with Miami-Dade County's submitted comments that emphasis on Storage Treatment Areas, Reservoirs and Aquifer Storage & Recovery wells should be considered for additional water storage during the Phase 2 PMP to address canals with increased flows and nutrient loading inputs into Biscayne Bay, such as the C-103. Back pumping to these storage options should also be considered.

Lastly, if it is determined that the addition of an eastern spreader canal will not delay the progress of BBCW Phase 2, the eastern spreader canal could be added to the BBCW Phase 2 Project and the C-111 SCE Project abandoned.

SPECIFIC COMMENTS ON DRAFT BBCW PHASE 2 PMP

To concur with the General Comments above, I suggest the following edits to the draft.

Section 1.1,1 page 12

1. Revise first paragraph first sentence to reflect the following:
Based on goal # five, the study area boundary to the west should be described as Everglades National Park (C-111W Canal).
2. Revise second paragraph first sentence as follows:
After North Canal, add “C-111 West Canal”

Section 2.0 Page 15

1. Revise first sentence as follows:
Insert “Phase 1” after BBCW
2. Revise third paragraph first sentence as follows:
Insert the word “additional” before freshwater; insert the words “adjacent to the C-111E Canal/Biscayne Bay and” before the words “in the model Lands”
3. Revise third paragraph as follows:
Add a sentence after the first sentence which states “Phase 2 will also consider the appropriate timing and distribution of additional freshwater to the bay and achieve a more appropriate salinity regime for the bay’s seagrass and faunal communities”

Section 2.2, Page 17

1. Revise the second paragraph as follows:
The study will address identifying options for providing additional freshwater to Biscayne Bay and Biscayne National Park to improve year round salinity regimes in Biscayne Bay and Biscayne National Park as well as addressing ecosystem restoration in locations south of the authorized BBCW Project and expanding the study area to include canal conveyance in the C-1, C-100, C-102 and C-103 canals. The study will also address ecosystem restoration in lands south of the North Canal, Model Lands, Card Sound, and additional locations in Biscayne Bay.
2. Revise the third paragraph as follows:
Objectives for the BBCW2:
 1. Restore and improve quantity, quality, timing and distribution of freshwater to the Bay, including Biscayne National Park to ensure appropriate year-round salinity by identifying additional sources of freshwater, analyzing options for additional sources, and implementing the preferred options.
 2. Restore nearshore and saltwater wetland salinity regimes.

3. Ensure adequate canal conveyance in the C-1, C-100, C-102, and C-103 Canals to implement the preferred options.
 4. Redistribute freshwater flow to minimize point source discharges to improve freshwater and estuarine habitat.
 5. Preserve and restore spatial extent of natural coastal glades habitat.
 6. Reestablish productive nursery habitat along the shoreline.
 7. Reestablish connectivity between Biscayne coastal wetlands, C-111 Basin, Model Lands, and adjacent basins.
3. Revise the fourth paragraph to include an additional bullet:
- Independent restoration studies, existing and future storage facilities and capabilities, and refined regional modeling.

Thank you again for the opportunity to submit my comments. I reiterate my concerns about the cost sharing difficulties and existing USACE policies and procedures that may not accommodate such an action of combining the planning processes of BBCW Phase 2 and C-111 SCE. I would support the approach of adding the spreader canal to the BBCW Phase 2 study and deauthorizing C-111 East following the approval of the PIR for BBCW Phase 2.

I look forward to working with you on an expeditious and productive planning process.

Sincerely,



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